

BellSouth Telecommunications, Inc.

Legal Department 1600 Williams Street

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April 30, 2004

The Honorable Bruce Duke Executive Director Public Service Commission of South Carolina Post Office Drawer 11649 Columbia, South Carolina 29211

Re: Proceeding to Establish Guidelines for an Intrastate Universal Service Fund

Docket No. 97-239-C

Dear Mr. Duke:

Enclosed for filing are an original and fifteen copies of BellSouth Telecommunications, Inc.'s Motion to Hold BellSouth's Pending Request for Additional State USF Funding in Abeyance in the above-captioned matter.

By copy of this letter, I am serving all parties of record with a copy of this motion as indicated on the attached Certificate of Service.

Sincerely,

Patrick W. Turner

PWT/nmI Enclosures

cc: All Parties of Record

PC Docs # 536785

## BEFORE THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA DOCKET NO. 97-239-C

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Proceeding to Establish Guidelines for an	
Intrastate Universal Service Fund	

## BELLSOUTH TELECOMMUNICATIONS, INC.'S MOTION TO HOLD BELLSOUTH'S PENDING REQUEST FOR ADDITIONAL STATE USF FUNDING IN ABEYANCE

BellSouth Telecommunications, Inc. ("BellSouth") and the Consumer Advocate recently entered a settlement agreement ("Agreement") that, upon approval by the courts, resolves all disputes arising out of another proceeding (Docket No. 1999-178-C). The Agreement provides in part that upon court approval of the Agreement, BellSouth will withdraw its request in this docket for additional funding from the State Universal Service Fund ("State USF"). On April 22, 2004, the Commission, the Consumer Advocate, the South Carolina Cable Television Association ("SCCTA"), and BellSouth filed a joint Motion for Remand to Approve Settlement Agreement with the Supreme Court of South Carolina. The Supreme Court has not yet ruled on this Motion.

Given the likelihood that BellSouth will be withdrawing its pending request for additional State USF funding in the near future, BellSouth respectfully requests that the Commission hold BellSouth's pending request in abeyance so that the Commission, its Staff, and the parties will not be required to expend additional time and resources considering issues that are, as a practical matter, moot at this time. As clarification,

BellSouth is not requesting that any other parties' request for additional withdrawals from the State USF be held in abeyance.

BellSouth has discussed this motion with counsel for the following parties who have been active in this proceeding to date: the Commission Staff; Alltel Communications, Inc., Bluffton Telephone Company, Inc., the Consumer Advocate, Hargray Telephone Company, Inc., Home Telephone Company, Inc., Horry Telephone Cooperative, Inc., ITC DeltaCom Communications, Inc., PBT Telecom, and SCCTA. Counsel for these parties have authorized BellSouth to inform the Commission that these parties have no objection to BellSouth's Motion.

Respectfully submitted,

Patrick W. Turner

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ATTORNEY FOR BELLSOUTH TELECOMMUNICATIONS, INC.

536768

## BEFORE THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA DOCKET NO. 97-239-C

IN RE: Proceeding to Establish Guidelines	)	
for an Intrastate Universal Service Fund	)	CERTIFICATE OF SERVICE
	)	

This is to certify that the undersigned, Nyla M. Laney, is employed by the Legal Department for BellSouth Telecommunications, Inc. and that she has caused BellSouth Telecommunications, Inc.'s Motion to Hold BellSouth's Pending Request for Additional State USF Funding in Abeyance in the foregoing matter to be served upon the persons named below this 30th day of April, 2004, by placing copies of same in the United States Mail, postage prepaid, addressed as follows:

Frank Ellerbe, III, Esquire Robinson, McFadden & Moore Post Office Box 944 Columbia, South Carolina 29202 (U.S. Mail and Electronic Mail)

F. David Butler, Esquire General Counsel South Carolina Public Service Commission Post Office Box 11649 Columbia, South Carolina 29211 (U.S. Mail and Electronic Mail)

Kennard B. Woods, Esquire
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Services LLC, MCI WORLDCOM
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WORLDCOM Network Services, Inc.
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yla M. Laney